

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION**

MDL No. 3:16-md-02738-MAS-RLS

This Document Relates To All Cases

**NOTICE OF MOTION TO EXCLUDE PLAINTIFFS' EXPERTS'  
OPINIONS REGARDING BIOLOGICAL PLAUSIBILITY/MECHANISM**

**PLEASE TAKE NOTICE** that on a date to be determined by the Court, the undersigned counsel will bring Defendants Johnson & Johnson and LLT Management, LLC (“Defendants”)’s Motion to Exclude Plaintiffs’ Experts’ Opinions Regarding Biological Plausibility/Mechanism before this Court. Defendants will ask for entry of an order that excludes Plaintiffs’ experts’ opinions regarding the proposed biological mechanisms.

**PLEASE TAKE FURTHER NOTICE** that in support of their motion, Defendants shall rely upon the Brief submitted herewith and the Declaration of Jessica Davidson, Esq., together with exhibits; and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Dated: July 23, 2024

Respectfully submitted,

/s/ Susan M. Sharko

Susan M. Sharko

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